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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

October 25, 2002

**Ex Parte Presentation**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, **S.W.**  
Washington, D.C. 20554

Re: *Application by SBC Communications Inc., et al. for Provision of In-Region,  
InterLATA Services in California*, WC Docket No. 02-306

Dear Ms. Dortch:

On behalf of SBC Communications Inc. ("SBC") and at the request of Commission staff, I am enclosing a response to allegations AT&T has raised in this docket regarding access to "alternative community listings" information. The enclosed response contains confidential information. Accordingly, pursuant to the Commission's rules governing confidential communications, I am enclosing one copy of this letter with the confidential material. Inquiries regarding access to this confidential material should be addressed to Jamie Williams, Kellogg, Huber, Hansen, Todd & Evans, PLLC, 1615 M Street, N.W., Suite 400, Washington, D.C., 20036. (202) 367-7819.

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Ex Parte Presentation

In accordance with this Commission's Public Notice, **DA 02-2333** (Sept. 20, 2002), SBC is filing the original and two copies of the redacted version of this letter and its attachment. Thank you for your assistance in this matter.

Yours truly,



Colin S. Stretch

Attachment

cc: Renee R. Crittendon  
Pam Arluk  
Tracey Wilson  
Lauren Fishbein  
Brianne Kucerik  
Phyllis White  
Qualex International (redacted version only)

REDACTED - FOR PUBLIC INSPECTION

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**ORIGINAL**

**ATTACHMENT**

In certain geographic areas in its region, Pacific offers end users “alternative community name” white pages directory listings. Thus, for example, an end-user living in Danville, California (the “postal community” for that end user) may elect to have Blackhawk (the alternative, or “prestige,” community name) listed as his or her community in the white pages directory. In comments filed in this proceeding on October 9, 2002, AT&T complains that Pacific fails to provide nondiscriminatory access to alternative community name information and that Pacific accordingly does not satisfy Item 2 of the competitive checklist, *see* 47 U.S.C. § 271(c)(2)(B)(ii). In fact, wherever alternative community listings are available to Pacific’s retail customers, they are also available to CLECs.

AT&T’s primary complaint appears to be that Pacific does not provide electronic access to alternative community name information and that, as a result, it is receiving inappropriate rejects on its LSRs. *See* Declaration of Walter W. Willard **on** behalf of AT&T ¶¶ 11-19 (“Willard Decl.”). This claim is based on a basic misunderstanding of the ordering process. When a CLEC seeks to migrate a Pacific retail customer to UNE-P or resale with no change to the directory listing, then there is no need for the CLEC to provide *any* community name on the local service request (“LSR”) it uses to order service. Community name information is only **required** in the ordering process if a CLEC seeks to change an existing directory listing or to establish a brand new listing

In those circumstances, moreover, the only community name information that is strictly necessary in order to submit a complete and accurate LSR is the *actual* community name – *i.e.*, the postal community. That is so because, contrary to AT&T’s claims, Pacific’s systems do *not* reject the CLEC’s order “if the community name on the LSR does not match that in the current directory listing.” Willard Decl. ¶ 13. Rather, when verifying the end user’s service location on the “End User,” or “EU,” portion of the LSR, Pacific’s Listings Gateway (“LGW”) checks the

LSR for the end user's *actual* location – *i.e.*, the postal community. To be sure, if a CLEC wishes to provide its end user an alternative community listing, it must include that alternative community on the "Directory Listing," or "DL," portion of the LSR. But that alternative information is in no way *necessary* to submit a complete and accurate LSR. On the contrary, if a CLEC did not have access to alternative community information, it could simply use the postal community listing on the LSR. It is therefore not the case that AT&T is receiving rejects due to any purported failure on the part of Pacific to provide access to alternative community information.

More to the point, CLECs do have access to alternative community listing information and therefore are able to provide end users with such listings. Pacific provides a "flat file" (similar to an Excel spreadsheet containing data fields) on the CLEC Online web site that provides all alternative community names available in California and Nevada, together with their associated postal community names, NPAs, and zip codes. A CLEC can transfer the flat file to a table or database within its own system, allowing this information to be integrated by those CLECs using application-to-application pre-order interfaces. CLECs also may access the flat file information electronically via the "Data Validation" link provided by Pacific's Enhanced Verigate pre-order interface.

However it is accessed, the flat **file** information allows CLECs to determine whether there is an available alternative community name for a particular end user's address and, if so, to offer that alternative listing to the end user. If the end user orders an alternative community on his or her directory listing, the CLEC must simply provide the alternative community name on the DL portion of the LSR. Information on the availability of alternative community names, including how to order them, is available at Section 4.13.2 of the CLEC Handbook White Pages User Guide. Currently, AT&T has more than \*\*\* active listings in the Pacific region

that use alternative community names. Of those, more than \*\*\* were ordered as part of a new or changed directory listing. AT&T is thus plainly able to provide such listings to its end user customers.

CLECs also have access to existing alternative community listing information for individual users. Specifically, the Directory Listing Inquiry transaction – which responds to CLEC requests within seconds – returns the community name (whether alternative or postal) currently listed for the end user in the white pages directory. This transaction is available through the Enhanced Verigate, EDI, and CORBA pre-ordering interfaces (*see* Huston/Lawson Aff. ¶ 112 (App. A, Tab 11)).

As AT&T appears to acknowledge, *see* AT&T Comments at 39; Willard Decl. ¶ 19, Pacific has recently identified and addressed certain ordering and pre-ordering issues relating to community name information. In particular, until recently, the LGW did not recognize valid abbreviations for either postal or alternative community addresses. This system issue has been corrected, and the LGW now recognizes valid community name abbreviations. In addition, on an Address Validation Inquiry, Pacific's pre-order interfaces previously returned the alternative community name, when available, rather than the postal community name. Pacific's business rules instruct the CLEC to use the community name returned on the Address Validation Query to populate the EU form. But, because the LGW edits the EU for the end user's actual location (*i.e.*, the postal community), use of the alternative community name resulted in a reject. Pacific has now modified its systems so that an Address Validation Inquiry returns the postal community name. This should prevent any rejects resulting from the CLEC using the community name returned by the Address Validation Inquiry to populate *the* EU form. It should be noted that AT&T does not challenge Pacific on the basis of these system changes, *cf.* Willard Decl. ¶ 19; AT&T Comments at 39, and in any event they have been resolved

Finally, AT&T claims that a number of its August UNE-P LSRs received rejects for “invalid community name” and assumes that those rejects resulted from its purported lack of access to alternative community names. Because LSRs are edited for postal community names, however, this claim makes no sense. We further note that, although AT&T claims to have received rejects for “invalid community names” on 5.9% of its UNE-P orders in August 2002, *see* Willard Decl. ¶ 15, AT&T provides no support for that figure, and Pacific believes it to be overstated. In addition, while Pacific is continuing to investigate the cause of the rejects AT&T has received, the investigation to date indicates that AT&T’s “invalid community name” rejects in August resulted from the system issues identified immediately above as well as from CLEC errors. SBC will provide additional information on this subject in its reply filing in this docket.